Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition for a Declaratory Ruling on	)	CC Docket Nos. 98-147; 96-98;
Loop Provisioning of the Association	)	98-141/NSD-L-00-48
for Local Telecommunications Services	)	

COMMENTS OF THE COMPETITIVE TELECOMMUNICATIONS ASSOCIATION

The Competitive Telecommunications Association ("CompTel") hereby submits these comments in response to the Public Notice issued by the Federal Communications Commission ("FCC" or "Commission") on May 24, 2000 soliciting comments concerning the Petition for Declaratory Ruling on Loop Provisioning ("Petition") filed by the Association for Local Telecommunications Services ("ALTS") on May 17, 2000 in the above captioned proceedings.[1] CompTel is the principal national industry association representing competitive telecommunications carriers and their suppliers. CompTel's diverse membership includes integrated communications providers ("ICPs"), competitive local exchange carriers ("CLECs"), data CLECs ("D-CLECs"), and internet service providers ("ISPs"), many of which are directly affected by ILEC provisioning of broadband local loops.

ALTS, in its Petition, asks the Commission to clarify, interpret, and modify existing FCC rules interpreting the Communications Act of 1934, as amended by the

[1] Public Notice, Federal Communications Commission, DA 00-1141, *In the Matter of The Association for Local Telecommunications Services Petition for Declaratory Ruling on Loop Provisioning*, CC Docket Nos. 98-147, 96-98, 98-141, NDS-L-00-48, released on May 24, 2000 ("*ALTS Petition*").

Telecommunications Act of 1996 ("the Act").[2] As ALTS itself notes, and CompTel concurs, many of the requested interpretations would simply reiterate, clarify, and reinforce existing Commission rules.[3] Granting such relief would not be at all prejudicial to ILECs, which already are legally obliged to comply with these rules, and any clarification of existing FCC rules would only serve to benefit states implementing the Act and competitors seeking enforcement of these same requirements. Thus, CompTel believes the Commission can, and should, grant these requests perfunctorily, and without subsequent debate on already-settled issues.

Similarly, CompTel concurs with ALTS that access issues to sub-loops in a fiber-fed remote terminal configuration are in clear need of Commission clarification. However, because these, and other issues specifically related to SBC's deployment of Project Pronto have already been addressed in the record of an existing public notice proceeding, by CompTel and many others, CompTel prefers that these issues be addressed sooner through resolution of SBC's pending request.[4]

However, ALTS also seeks several interpretations of, or modifications to, existing FCC rules that would, if adopted, prove to be of substantial benefit to competition. Specifically, ALTS requests that the Commission adopt maximum provisioning intervals for UNE loops, determine a deadline for ILEC electronic OSS implementation, and establish prima facie federal penalties for ILEC failure to comply with these rules.

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[2] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 47 U.S.C. § 151 *et. seq.* (1996).
[3] Here, CompTel is specifically referring to ALTS' two requests regarding Rule 51.319 (existing obligations noted in *ALTS Petition*, pp. 5-6); ALTS' request regarding nondiscriminatory provisioning of special access circuits (Section 202(a) of the Act forbids unreasonable discrimination, or preference, in the provisioning by a common carrier of "like services," which tariffed services necessarily constitute); and ALTS' request regarding the application of Commission pricing rules to all loops (existing obligations noted in *ALTS Petition*, pp. 29-30).
[4] Letter from Paul K. Mancini, Vice President and Assistant General Counsel, SBC, to Lawrence E. Strickling, Chief of the Common Carrier Bureau, FCC (Feb. 15, 2000).

CompTel strongly echoes the very real problems that give voice to ALTS' requests, and urges the Commission to grant them to the extent possible in this proceeding. CompTel will address and support these specific requests below.

I. The FCC Should Establish Specific Loop Provisioning Intervals

ALTS asks the Commission to adopt nationwide certain provisioning standards, which the Texas Public Utility Commission implemented, reasoning that the Commission has cited these standards with approval in the past.[5] ALTS argues that these intervals are necessary in order to ensure that all local loops, including broadband loops, are provisioned in a non-discriminatory manner.

The Commission has unequivocally spoken on this issue in its *Local Competition First Report and Order*, [6] in which it held that Unbundled Network Element ("UNE") terms and conditions must be provided to all requesting carriers by the ILEC at terms and conditions equal to that which the carrier provides to itself. Obviously, the precise standard that applies to xDSL capable loops requires some degree of clarification. The standard for nondiscriminatory access to UNEs set forth in the *Local Competition First Report and Order* is "a meaningful opportunity to compete."[7] With respect to POTS loops, the ILEC does not provision itself a "loop" (as a competitor would need to purchase the element) but rather, the loop is merely one part of an already-integrated service. However, in the xDSL capable loop context, the "meaningful opportunity to

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[5] *ALTS Petition* at 27, *citing Deployment of Wireline Services Offering Advanced Telecommunications Capability,* CC Docket No. 98-147, Third Report and Order, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* CC Docket No. 96-98, Fourth Report and Order, FCC 99-355 (rel. Dec. 9, 1999) (*"Line Sharing Order"*), ¶ 174.

[6] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* First Report and Order, 11 FCC Rcd. 15,499 ¶ 315 (1996) (*"Local Competition First Report and Order"*).

[7] *Local Competition First Report and Order,* ¶ 315.

compete" standard has slipped even further to what could only charitably be deemed a "best efforts" standard.

The current dismal state of xDSL capable loop provisioning is clearly illustrated in the attached affidavit of Susan Tyriver, Manager of Customer Services with CompTel member, Advanced TelComGroup, Inc. ("ATG"). ATG is a facilities-based provider of integrated voice and data services to generally low population cities and towns (i.e. one or two ILEC Central Offices ("COs")).

ATG has identified several instances representative of the disparate treatment received by competitors in the installation and repair of xDSL loops.[8] These practices include the incumbent carrier's failure to properly provision loops by the due date, missing the deadline, and not setting up circuits to exact specifications.[9] ATG notes that, on more than one occasion, it has called the ILEC to complain that it has not delivered the circuit, only to be told by the incumbent that the circuit has already been delivered, even though ATG has not received it.[10] In addition, ATG believes that the ILEC technicians are not properly testing the circuits at the time of delivery, evidenced in one respect by the numbers of incorrectly matched pairs.[11]

As ATG explains, when the ILEC fails to adequately provision service in a timely manner, the problem is exacerbated because the competitor must then navigate cumbersome, and inefficient, "repair" procedures simply to get the initial order provisioned correctly. For example, the CLEC must open a separate trouble ticket for

[8] *See* Affidavit of Susan Tyriver (appended hereto as Attachment 1).
[9] *Compare* SBC CLEC Handbook, UNE sections 1.1.6 – 1.1.7, *cited* in Tyriver Aff., ¶ 5 (appended hereto as Attachment 2).
[10] Tyriver Aff., ¶ 15(a)
[11] Tyriver Aff., ¶ 11.

each probable cause for installation failure, following which the ILEC will send out a copper technician (instead of the appropriate pair gain technician) to check the installation.[12] In the case of ATG, SBC has further required that an ATG technician accompany the ILEC technician in the repair before the ILEC technician will even attempt to correct the installation failure.[13] Thus, the CLEC not only suffers a customer-affecting delay in service installation, but must pay both its own technician and the ILEC technician(s) simply to obtain the loop as ordered.

While the problems CLECs experience may seem, fundamentally, to be problems of establishing and coordinating CLEC/ILEC procedures and business rules, the solution is precisely as ALTS has proposed. Were the appropriate standard for nondiscriminatory provisioning of xDSL loops to be strict parity, the ILEC would have a strong incentive, easily subject to regulatory scrutiny, to work to ensure that these clear standards were met. While the Texas standard seems reasonable to CompTel, the FCC should at a minimum, clarify the Act's requirements in a manner that allows states to establish their own standards. Such action will provide ILECs, CLECs, and regulators with a uniform yardstick with which to evaluate ILEC performance on this critical UNE.

II. THE COMMISSION SHOULD ADOPT FEDERAL GUIDELINES BY WHICH ALL ILEC OSS INTERFACES HAVE ACCESS

For the foregoing reasons, CompTel strongly supports ALTS' request that the Commission order federal guidelines by which all ILEC OSS interfaces have access. CompTel suggests that the FCC consider requiring all ILEC interfaces to be capable of bare minimum OSS performance and functionality guidelines by a date certain.

[12] Tyriver Aff., ¶ 12, 14.
[13] Tyriver Aff., ¶ 12, 15.

However, perhaps only to highlight its importance, ALTS confines its discussion to the pre-order functionality for xDSL loops. CompTel agrees with ALTS, but would further ask the FCC to consider that, with very limited exceptions, most ILECs have never demonstrated compliance with the requirements of the *Local Competition First Report and Order.*

III. THE COMMISSION SHOULD ESTABLISH REBUTTAL PRESUMPTIONS FOR ILEC NONCOMPLIANCE OF EXISTING LOOP PROVISIONING RULES

CompTel agrees with the ALTS Petition that meaningful penalties must constitute a part of any successful enforcement of federal mandates. The Petition suggests that the Commission establish *prima facia* penalties that would apply in all subsequent enforcement or remedial proceedings.[14] It also suggests that the Commission should include findings of ILEC liability under this scheme to be included as part of any subsequent § 271 application. CompTel supports this position and strongly encourages the Commission to consider additional enforcement mechanisms on the federal level that would provide a monetary incentive for ILEC compliance with the competitive mandates of the 1996 Act.

CompTel had previously suggested to the FCC, within the context of Bell-Atlantic New York's § 271 Application to provide in-region InterLATA services in New York, that the FCC should adopt a comprehensive anti-backsliding blueprint, in addition to any state performance schemes.[15] CompTel believes that certain ILEC failures to

[14] *ALTS Petition,* pg. 31.
[15] Comments of CompTel, *In the Matter of Application by New York Telephone Company (d/b/a Bell Atlantic-New York), et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in New York,* CC Docket No. 99-295, filed October 19, 1999.

comply with the basic obligations under § 251, depending on the degree of severity (as measured by objective standards) should constitute *prima facia evidence* of liability. Evidentiary presumptions would facilitate not only more expedient enforcement actions by regulators, but would enable competitors to pursue consequential damages under Section 207 of the Act with greater efficiency and certainty.

However, if the FCC were to adopt *prima facia* "penalties" (presumably forfeitures pursuant to Section 503(b)(1)(B) of the Communications Act of 1934), the Commission would need to establish different standards for "willful and repeated violations." There is no doubt that these standards would be more difficult to satisfy than simple violations under § 207. Moreover, the FCC would probably be better off procedurally by opening a separate proceeding to establish the proposed *prima facia* penalties. In order to ensure maximum relief in this proceeding, CompTel proposes that the FCC consider *prima facia* evidentiary presumptions, as opposed to the *prima facia* penalties requested by ALTS. CompTel, nonetheless, shares ALTS' belief that imposing economic disincentives for noncompliance is essential to ensuring that local markets are open to new entrants.

IV. CONCLUSION

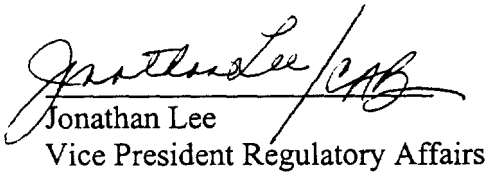
ALTS has requested that the FCC issue a declaratory ruling to clarify, intrepret and modify existing FCC rules with respect to high-capacity loop provisioning. CompTel believes that many of ALTS' requests would simply reiterate, clarify and reinforce existing Commission rules. However, CompTel supports awarding the declaratory judgment, insofar as it is not prejudicial to ILECs and it will only serve to

help guide state commissions implementing the Act. Thus, CompTel requests that the Commission grant these requests without further comment.

In addition, other requests in the ALTS Petition may need further interpretations and modification by the FCC. These include determining a deadline for ILEC OSS interface access, and establishing *prima facia* federal penalties for ILEC noncompliance. CompTel believes that both of these modifications to existing FCC rules will strengthen the growth of new entrants in local markets.

Respectfully Submitted,

THE COMPETITIVE TELECOMMUNICATIONS ASSOCIATION



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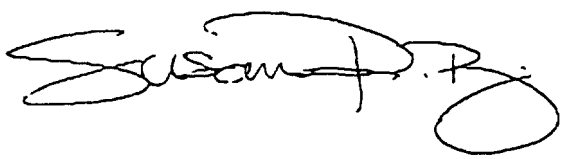
AFFIDAVIT OF SUSAN TYRIVER

1. My name is Susan Tyriver. I am employed with Advanced TelCom Group, Inc. ("ATG"). My position is Manager of Customer Services, a position I have held since February, 1999. My responsibilities include managing customer service for ATG's western division as well as managing the relationship with SBC Communications, Inc. for ATG Customer Service Western Division. I also have major responsibility for identifying and tracking problems with the delivery of xDSL capable loops by Pacific Bell and/or Nevada Bell ("PB/NB") to ATG.
2. ATG provides primarily facilities-based, integrated voice and data services to small and medium sized businesses and residential consumers in smaller cities and towns. It is often the case that the only means by which ATG can provide customers in these areas with "high speed" data service is through "Integrated Digital Subscriber Line technology ("IDSL").
3. IDSL is a symmetric service. By providing IDSL, ATG can increase the efficiency of its CO-collocated equipment since IDSL allows the number of "addressable" customers at each CO to increase, especially in comparison to ADSL.
4. ATG has been ordering and provisioning xDSL capable loops is in the Pacific Bell and Nevada Bell territories for approximately a year.
5. SBC has provided certain specifications for each flavor of xDSL capable loops in their CLEC handbook that detail what they will provide in response to a request for a particular type of xDSL loop. (CLEC Handbook, UNE section 1.1.6 –1.1.7) For example, SBC specifies in the CLEC handbook that a DSL capable loop will have no load coils. (CLEC Handbook, UNE section 1.1.7)
6. Despite these specifications, ATG has been experiencing an increased failure rate for delivery of IDSL capable loops.
7. The effects of these provisioning problems have been significant: during the period from May 2, 2000 to May 30, 2000 Pacific Bell failed to properly install IDSL capable loops for ATG 45% of the time. During the period from March 17, 2000 through June 12, 2000, Nevada Bell failed to properly install xDSL capable loops for ATG 33% of the time.
8. Based on information received from ATG's Operations Managers and information received from PB/NB's Local Operations Center ("LOC") I have determined several possible reasons for these failures to be occurring. The following 5 paragraphs of this affidavit list several of those possible reasons.
9. PB/NB is not properly connecting the xDSL circuits from the PB/NB main frame to ATG's collocation site by the due date.
10. The xDSL circuits are not up to specifications at the time delivery is due. For example, IDSL circuits are being delivered with load coils.
11. At the time of delivery, ATG has many examples of bad pairs. One possible reason for this is that PB/NB technicians are not testing the circuits at the time of delivery.
12. In addition to the above failures, PB/NB is also delaying a successful installation of these failures through the following three practices: 1) requiring a separate trouble ticket to be opened on each probable cause for failure; 2) sending out a

copper technician to check the installation instead of a pair gain technician; and 3) requiring an ATG technician to meet the PB/NB technician.

13. First, on several occasions when ATG has called PB/NB LOC to report a failed installation, ATG identifies what ATG believes to be the cause of the installation failure. Where ATG identifies more than one cause (e.g. open at the frame and load coils) the provisioning center requires ATG to choose which cause PB/NB shall open a trouble ticket on. This practice leads to delay because as soon as one cause is fixed ATG must request the opening of another trouble ticket to fix the next cause and so on until the xDSL circuit is successfully delivered.
14. Second, by sending out a copper technician, PB/NB delays the "repair" of the installation because the copper technician is not familiar with the installation requirements for an iDSL capable loop.
15. Third, requiring an ATG technician to meet the PB/NB technician to "repair" the installation delays the process because the two technicians must coordinate to meet when both are available. This requirement also imposes additional costs upon ATG, which are not reimbursed by PB/NB, even when the trouble with the installation is determined due to PB/NB, not ATG. The following examples are representative of the types of problems ATG is encountering in delivery of xDSL loops.
    a. Pacific Bell committed to deliver an IDSL circuit to ATG on February 29th. On that date, ATG did not receive delivery of the IDSL circuit. Pacific Bell was contacted and a trouble ticket was opened. Pacific Bell stated that they would deliver the circuit by March 1st. On March 3d ATG was told that the problem has been referred to Pacific Bell's engineering division. On March 15th Pacific Bell informed ATG that they had completed delivery of the circuit February 25th. On March 20th ATG [redacted] received delivery of the IDSL circuit.
    b. Pacific Bell committed to deliver an ADSL circuit to ATG on March 3rd. On that date ATG did not receive delivery and called Pacific Bell. Pacific Bell informed ATG that the ADSL circuit had been delivered. On March 7th Pacific Bell [redacted] sent a technician out to check the installation and found that the circuit had not been connected from Pacific Bell's mainframe to ATG's collocation site and that the fieldwork had not been done on the circuit to make sure that it was up to specification for delivery.
16. In addition to the failure to deliver an xDSL circuit by the assigned due date, ATG has received invoices from PB/NB with additional labor charges for xDSL installations. Because of the time difference between the due date for the delivery of the xDSL circuit and the invoice date for the additional labor charges, ATG has had a difficult time auditing these charges. ATG has repeatedly asked PB/NB to research these charges. ATG's latest request was sent to Pacific Bell on June 9, 2000. As of today, ATG has still had no response. The following examples are representative of the additional labor charges being assessed against ATG by PB/NB.

17. On April 4, 2000 Pacific Bell committed to deliver an ADSL circuit to ATG. On April 4th ATG was charged $36.32 for additional acceptance testing. [ATG does not do acceptance testing.]
18. On April 4, 2000 Pacific Bell committed to deliver a HDSL circuit. On April 11th ATG was charged $108.96 for service maintenance to "repair" the installation of the HDSL circuit.
19. On April 3, 2000 Pacific Bell committed to deliver an IDSL circuit. On April 11th ATG was charged a $199.76 for service maintenance to "repair" the installation of the IDSL circuit.
20. On March 6, 2000 Pacific Bell committed to deliver an xDSL circuit. On April 6th ATG was charged $72.64 for service maintenance to "repair" the circuit.
21. On February 11, 2000 Pacific Bell committed to deliver an xDSL circuit. On April 7th, ATG was charged $36.32 for service maintenance to "repair" the circuit.



6/23/2000

Unbundled Network Elements (UNE)
Revised: 06-20-00

1.0 Unbundled Loop

1.4.1 Charges for Unbundled Loop

1.4.2 Billing & Payments for NIDs and Unbundled Loop

Overview

The FCC identified network elements that incumbent Local Exchange Carriers (LECs), such as Southwestern Bell, Pacific Bell, and Nevada Bell (SWBT, PB, NB) must provide. The network elements are:

- Local Loops
- Local and Tandem switching
- Transport, including Unbundled Common Transport (UCT) and Unbundled Dedicated Transport (UDT)
- Network Interface Devices
- Access to signaling and call related databases
- Access to Operations Support System functions
- Access to Operator and Directory Assistance Facilities
- Other elements that may be required by specific state commissions

Of this list, the following sections will be discussed in this section:

1.0 Unbundled Loop
2.0 Unbundled Local Switching
3.0 Unbundled Transport Services
4.0 Databases and Associated Signaling for Routing and Completion
5.0 Access to UNEs

Refer to Operations Support System (OSS) and Operator and Directory Assistance Facilities for more information related to these topics.

CLARIFICATION NOTICE - The Eighth Circuit Court of Appeals decision in the appeal of the FCC's order in Case No. 96-98 (including the Court Order on Reconsideration) determined that an incumbent local exchange provider is not obligated to combine unbundled network elements on behalf of a competitive local exchange provider. Accordingly, PB/NB are no longer obligated to recombine network elements on a local wholesale customer's behalf. Accordingly, any inference, explicit or implied in these materials, to PB/NB performing combinations of unbundled network elements is subject to revision and/or deletion

Who Can Order
Unbundled Network Elements can be ordered by the following:

- Entities certified as CLECs by the California Public Utilities Commission. CLECs of various types, including, but not limited to:
  - Competitive Access Providers (CAPs)
  - Interexchange Carriers (IECs)
  - Cable Companies
  - Enhanced Service Providers (ESPs)
  - Payphone Service Provider (PSPs)
  - Local Exchange Carriers (LECs)
  - Independent Telephone Companies
- EUs (certified as CLECs) from the National and Public Sector which have their own telephone systems.

- UNEs cannot be ordered via tariff, they must be ordered pursuant to the provisions of negotiated interconnection agreements.

1.0 Unbundled Loop

Overview

An Unbundled Local Loop is a dedicated transmission between a distribution frame (and its equivalent) in a SWBT Central office and End User (EU) premises. Loops provided as UNE will meet the parameters contained in the Technical Publication associated with each loop type.

1.1 Types of Unbundled Loop Elements

1.1.1 Network Interface Devices

A CLEC may connect its unbundled local loops to EU's inside wiring through the NID and an adjoining NID deployed by requesting carrier. The NID is provided as the loop interface used to connect loop facilities to inside wiring. The fundamental function of the NID is to establish the official network demarcation point between a carrier and its end user (EU). The NID contains the appropriate and accessible connection points or posts to which the service provider and the EU each make its connections.

The NID component of the loop provides access to the customer provided inside wire at the EUs premise. It does not include any inside wire at the EU's premises.

Note: If a CLEC purchases a PB/NB Unbundled Local Loop, a separate NID will not be required.

Two Categories of NIDs

NIDs are offered in two general types:

- A simple NID is a Standard Network Interface (SNI). The use of which permits the EU's inside wiring to be isolated from PB/NB's network.
- A complex NID is a building terminal where an EU's inside wiring terminates on PB/NB's network.

A CLEC will provide its own NID and will interface to the customer's premises wiring through connections in the customer chamber of the PB/NB NID.

Important: Any connection of dial tone to this unit will damage PB/NB's network. The CLEC will be responsible for any damage incurred.

1.1.2 2-Wire Analog Loop

A 2-Wire 8 dB Analog Basic Loop supports analog voice frequency voice band services with loop start signaling with the frequency spectrum of approximate 300 Hertz (Hz) to 3000 Hz. Interface and performance parameters are set forth in **TP 76860 Unbundled Facilities.** A 2-Wire 5 dB Analog Assured Loop is offered by PB/NB as the standard conditioning option available for ground start signaling and reverse battery. Interface and performance parameters are also set forth in **TP 76860 Unbundled Facilities.**

There is a monthly recurring charge and one-time nonrecurring charge associated with the basic 8dB Unbundled Loop and the assured 5 dB conditioning option, as well as related service order charges.

1.1.3 4-Wire Analog Loop (Formerly Named 4-Wire Link/Voice Grade1)
A 4-Wire Analog Loop provides a non-signaling voice band frequency spectrum of approximately 300 Hz to 3000 Hz. The 4-Wire Analog Loop provides separate transmit and receive paths. Interface and performance parameters are also set forth in **TP 76860 Unbundled Facilities**. This 4-Wire Analog Loop is available with Facility Interface Connection option.

There is a monthly recurring and one-time nonrecurring charge associated with the 4-Wire Analog Loop, as well as related service order charges.

1.1.4 2-Wire Digital Loop
A 2-Wire Digital Loop supports Basic Rate ISDN (BRI) and conforming IDSL (ISDN Digital Subscriber Line) digital services. The 2-Wire Digital Loop supports usable bandwidth as set forth in **TP 76860 Unbundled Facilities**.

Acceptance testing is offered for ISDN/DSL loops. Acceptance testing can be requested on the LSR/ISR/ASR by providing "Acceptance Test Required" in the remarks section of the request. Acceptance testing will be performed with the CLEC on the Plant Test Date (due date – 3). Charges for Acceptance Testing may apply. (175T Tariff)

All requests for ISDN/DSL Capable Loops will be subject to a Loop Qualification Process and an associated charge. ** This process examines the available loop facility for suitability in terms of physical characteristics and spectrum compatibility. The Loop Qualification Process charge will be billed to the CLEC as shown in Appendix Pricing for each loop analyzed whether or not it will support the desired application

There is a monthly recurring and one-time nonrecurring charge associated with 2-Wire Digital Loop, as well as related service order charges.

1.1.5 4-Wire Digital Loop (Formerly Named Digital 1.544 Mbps (DS1))
4-Wire Digital Loop supports DS1 digital services including Primary Rate ISDN (PRI). The 4-Wire Digital Loop supports usable bandwidth as set forth in **TP 76860 Unbundled Facilities**.

There is a monthly recurring and one-time nonrecurring charge associated with the 4-Wire Digital Loop, as well as related service order charges.

1.1.6 2-Wire ADSL Capable Loop
A 2-Wire ADSL Capable loop supports the transmission of Asymmetrical Digital Subscriber Line technologies which conform to the Spectral Parameters identified in **TP 76730 ADSL Based Services Network Interface/Interconnection Specification**. Interface and performance parameters are set forth in **TP 76860 Unbundled Facilities**.

All requests for ADSL Capable Loops will be subject to a Loop Qualification Process and an associated charge. This process examines the available loop facility for suitability in terms of physical characteristics and spectrum compatibility. The Loop Qualification Process charge will be billed to the CLEC as shown in Appendix Pricing for each loop analyzed whether or not it will support the desired

application.

If the results of the Loop Qualification Process analysis indicates that special loop condition (i.e., removing an existing mid-span repeater, bridged tap, or load coils) will permit the loop to meet the parameters for the requested usage, the CLEC will be notified of appropriate charges quoted as set forth in Appendix Pricing under ADSL Conditioning Options before commencement of the work. If the CLEC authorizes the PB/NB specified condition options, the CLEC will be billed for such work at the rates shown.

ADSL Conditioning Options, if applicable, have a one-time nonrecurring charge associated with each of the options of:

- Removal of Bridged Tap Option
- Removal of Load Coil Option
- Removal of Repeater Option
- Conditioning over 17.5 kft.. Option. (this does not apply in California.)

There is a monthly recurring and one-time nonrecurring charge associated with ADSL Capable Loop, as well as related service order charges.

Acceptance testing is offered for ADSL loops. Acceptance testing can be requested on the LSR/ISR/ASR by providing "Acceptance Test Required" in the remarks section of the request. Acceptance testing will be performed with the CLEC on the Plant Test Date (due date – 3). Charges for Acceptance Testing may apply. (175T Tariff)

Revised: 06-20-00

1.1.7 DSL LOOP

The DSL Capable Loop is a non-switched, digital data loop. The capability of the loop is determined by the physical characteristics of the loop and the spectral compatibility with other existing digital services.

The DSL Capable Loop is currently defined as follows:

A single copper pair originating at the CLEC collocation arrangement in the Central Office (CO) and terminating at the EU Demarc, with the following characteristics:

- No load coils
- No repeaters. The exception is IDSL, where an Adtran repeater is acceptable
- No DAML
- No greater loss than 38 dB end to end, measured at 40,000 Hz with 135 ohms at the Central Office POI (point of interface) and 135 ohms at the MPOE

Acceptable Bridged tap (BT) is 1500 ft. As longer BT increments impact need for additional loop length, BT may be eliminated through conditioning.

Equivalent 26-gauge loop length will vary for each DSL service.

The DSL Loop will not include any inside wiring, or other equipment at the EU premises.

Limitations

DSL Loops are limited by the following:

- Origination must be from a CLEC's Collocation Cage
- DSL Loops cannot ride a higher facility (e.g., DS1, DS3)
- If the CLEC's EU is located in an area served by Digital Loop Carriers (DLCs), and there is a lack of copper facilities, then Pacific Bell will deny the request for DSL service

Note: The only exception to this is IDSL, which may be provisioned over any loop that could support ISDN.

Refer to Ordering DSL for Service Order instructions.

Qualifying DSL Service

Loop qualification enables CLECS to perform the following:

- Obtain Loop qualification information via Verigate or Datagate, based upon the standard loop design for the longest loop in their end user's distribution area

With mechanized Loop qualification:

- Pacific Bell/Nevada Bell automatically performs a mechanized loop qualification upon receipt of a valid LSR
- All loops are qualified by the CLEC's End User Address provided on the End User Form of the LSR
- If the Loop distance does not meet the specifications of the SPEC code requested, the LSR is rejected back to the CLEC requesting that a SUPP be issued.

If the results of the Loop qualification indicate that special loop conditioning is available, (i.e., removing an existing mid-span repeater, bridged tap, or load coils), the CLEC may place the order with the appropriate Service and Product Enhancement Code (SPEC) to request conditioning. Refer to Loop Qualification SPEC Codes for additional information.

If the CLEC authorizes some or all of the Pacific Bell/Nevada Bell specified conditioning options, the CLEC is billed for such work as specified in their interconnection agreement.

DSL Conditioning Options, if applicable, have a one-time nonrecurring charge associated with each of the options of:

- Removal of Bridged Tap
- Removal of Load Coil
- Removal of Repeater
- Removal of DAML

The Conditioning Over 17.5 kilofeet (kft). Option, charges for DSL Capable Loops over 17.5 kft are billed on an incremental basis in addition to the standard conditioning charge(s).

There is a monthly recurring and one-time nonrecurring charge associated with DSL Capable Loop, as

well as related service order charges.

Note: CLECs are not billed for requesting conditioning if the loop is less than 12,000 feet and the conditioning is required to meet minimum qualification standards for Pacific Bell/Nevada Bell low speed DSL tariff offering, (i.e. removal of load coil, removal of repeaters, bridged tap in excess of 2,500 feet, or DAML).

Note: CLECs can send Service Requests for DSL loops without initiating the Loop Qualification process. The LSC will qualify all loop orders against a valid LSR, and if appropriate, send a request to Engineering for a manual Detailed Loop Report, (refer to **Mechanized & Manual Loop Qualification Via Toolbar/Verigate** for additional information). CLECs are billed the appropriate loop qual charges as specified in their interconnection agreement.

"As Is Option"

CLECs may use the "As Is" option by utilizing the "UALNQX SPEC Code. Use of this SPEC Code indicates that the CLEC wants Pacific bell/Nevada Bell to provision the loop regardless of whether the loop meets the industry standards for the specified Power Spectrum Density (PSD).

Mechanized & Manual Loop Qualification Via Toolbar/Verigate

Prior to submitting a DSL Capable Loop LSR to the LSC, CLECs can pre-qualify loops mechanically through the Verigate function in Toolbar. The mechanized Loop Qualification database provides basic loop information and loop make-up detail for a CLEC's EU address.

Note: CLECs who do not have access to Toolbar/Verigate, must first obtain an OSS Agreement through their Account Manager, and be scheduled for Toolbar/Verigate training.

Mechanized Loop Qualification provides CLECs the capability to:

- View Loop Qualification prior to submitting and LSR
- Order a Loop with the appropriate SPEC code to request conditioning on the initial LSR
- Request Detail Loop Qualification based on:
  - Design Data (Indicator "B")
  - Actual Data (Indicator "A")
- Request a Manual Loop Qualification for additional information

CLECs can receive Manual Loop Qualification Results by:

- E-mail
- Verigate

To receive Manual Loop Qualification results by e-mail, CLECs must provide the LSC with a designated e-mail address. All Manual Loop Qualification results are e-mailed back to the CLEC when the request has been completed by the Engineering Department.

CLECs can also choose to view the manual loop qualification results through Verigate by periodically checking the "View Result of Manual Request Report" on the "Loop Qualification Information Screen."

For detailed information on accessing the loop qual screens and interpretation of loop qual conditions, refer to the Verigate User Guide, "Loop Qualification Processes" located in the Job Aids section of the IS Call Center link on the main CLEC Online page.

Loop Qualification SPEC Codes

The following SPEC codes are dependent on the loop qualification results and can be used only after the CLEC receives loop qualification results:

SPEC Code	Loop Qualification Result
UALM13	• "No Conditioning Authorized" Loop capable of supporting high ADSL speed and conditioning is not needed • Applies to PSD # 5, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
UALM32	• DSL Capable Loop which meets minimum qualification standards for requested PSD. • Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
UALNQX	• "Authorized As Is." • DSL Loop may require conditioning to support PSD requested, but CLEC accepts loop as is without conditioning • Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
UALRLX	• DSL Capable Loop and removal of load coil • Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
UALRTX	• DSL Capable Loop and removal of bridged tap • Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)

	• DSL Capable Loop and removal of repeater
UALRRX	• Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
	• DSL Capable Loop and removal of load coil and bridged tap
UALRLT	• Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
	• DSL Capable Loop and removal of bridged tap and repeater
UALRTR	• Applies to all DSL/PSDs, HFPL/Line Sharing, and UNE Broadband DLE (Line Sharing & Data Only Loop)
UNBSBL UNE Broadband DLE (Line Sharing & Data Only Loop)	Unbundled Subloop DLE Data Only

Note: The following conditions result in requests that exception to the LSC and are rejected back to the CLEC:

- No SPEC code indicated
- Loop Qual results indicate Pair Gain/Digital Loop Carrier (DLC) = 1
- When the Pacific Bell/Nevada Bell Retail account is in Suspend for Non-Payment (SNP) status

Ordering DSL

CLECs may order DSL using their standard ordering interface. This service is currently ordered on the Billing Account Number (BAN), which supports the ISDN/DSL LINK service.

Pacific Bell/Nevada Bell will continue to offer xDSL based on DSL technologies, A (ADSL), H (HDSL), I (IDSL), or S (SDSL) and loop length to CLECs who have xDSL language in their contracts until expiration.

New DSL contracts or amendments will contain the Digital Subscriber Line / Power Spectrum Density offerings (DSL/PSD). Refer to **Ordering Digital Subscriber Line/Power Spectral Density (DSL/PSD), and Line Sharing** for additional information.

Service Requests for DSL must utilize the following codes on the LSR, as appropriate:

DSL Type	NC Code	NCI Code	SEC NCI Code	CKT Modifier
ADSL	AC --	02QB9 00A	02DU9 00A	ACQU
HDSL	AH --	02QB9.00H	02DU9.00H	AHQU
IDSL	UB --	02QC5.OOS	02IS5	UBQU
SDSL	AD --	02QC5.OOS	02IS5	AGQU

Important: An Expanded Interconnection Service Cross Connection (EISCC) must be provided to connect the Loop from the Main Distribution Frame (MDS) or the Intermediate Distribution Frame (IDF), to the CLEC's Collocation Cage.

The following are required Fields on the Loop or Loop w/NP Form:

- (System ID) - System Identification Field, which identifies the CLEC's system to be used in their Collocation Cage, e.g. ABC50
- (Cable ID) - Cable Identification Field, which identifies the Service Provider's Central Office Cable to be connected to the CLEC's collocated equipment, e.g. 26-NL
- (Chan/Pair) - Channel Pair Field, which identifies the specific channel or pair within the Service Provider's Cable to be used for connection, e.g. 0133

Note: Each DSL Loop requires a single EISCC assignment

Important: CFA cannot be used with DSL Loops

The CLEC will have the ability to request acceptance testing on the service request by stating in Remarks:

ACCEPTANCE TEST REQUIRED CALL 800-XXX-XXXX

(XXX-XXXX indicating the number to contact the CLEC on the due date to test.) On the Plant Test Date (due date minus three business days), when the Field Technician completes his/her work, he/she will contact the Local Operations Center, who will three-way call on the CLEC test number. The CLEC will ask for opens or shorts at the MPOE to check if complete continuity has been established.

Once the test is complete, the CLEC will decide whether to accept the loop. If not, the Field Service Technician and LOC Maintenance Administrator will review the service order and the facility makeup and perform continuity checks to determine the problem. Once the loop is accepted, the LOC Maintenance Administrator will cumulate the time and bill the CLEC for testing, utilizing the EO135 billing process and 175T tariff charges.

If the test proves that the Pacific Bell side of the network is not wired or designed per CLEC request, there will be no charge to the CLEC. If the circuit is designed and installed correctly as ordered by the CLEC, there will be a charge for the acceptance test, regardless of working status.

Ordering Digital Subscriber Line/Power Spectral Density (DSL/PSD), and Line Sharing

Service Requests for DSL/PSD are sent to the LSC via:

- Local Service Request (LSR)

- Interconnection Service Request (ISR)

  Note: ISRs are scheduled to be phased out by the end of 2000

New fields have been established on the LSR to enable flow-through capability with the exception of PSD 1a (IDSL), which requires manual handling by the LSC. Refer to Section **1.3.4.1 Unbundled Loop - Mechanized Flow**-Through for additional information.

CLECs who currently use the ISR through CESAR, can indicate the new required fields in the Remarks section of the order. These orders are not flow-through capable, and exception to the LSC for manual handling.

The following matrix provides the PSD Classes and corresponding NC, NCI, and SEC NCI order entries required for DSL Service Requests:

PSD Class #	Loop Description	NC Code	NCI Code	SEC NCI Code
	2-Wire DSL (Digital) Loop			
1a	• Supports IDSL • Not flow-through capable, orders will exception to the LSC	LX - -	02QB5.001 (non-shielded) or 02QB5.0S1 (shielded)	02IS5
1b	2-wire DSL (Copper) Loop • Supports SDSL	LX- -	02QB5.001 (non-Shielded) or 02QB5.0S1 (Shielded)	02DU5.001
2	2-wire DSL (Copper) Loop • Supports SDSL • 0-115 kHz, 17.5 kft	LX- -	02QB5.002 (non-Shielded) or 02QB5.0S2 (Shielded)	02DU5.002
3a	2-wire DSL (Copper) Loop • Supports HDSL • 0-238 kHz, 17.5 kft	LX- -	02QB5.003 (non-Shielded) or 02QB5.0S3 (Shielded)	02DU5.003

3b	4-wire DSL (Copper) Loop • 0-370 kHz, 12 kft if 24 gauge or heavier • 9 kft if 26 gauge	LX- -	04QB5.003 (non-Shielded) or 04QB5.0S3 (Shielded)	04DU5.003
4	2-wire DSL (Copper) Loop • TU-C 440 kHz, • TU-R 300 kHZ, 12 kft if 24 gauge or heavier • 9 kft if 26 gauge	LX- -	02QB5.004 (non-Shielded) or 02QB5.0S4 (Shielded)	02DU5.004
	2-wire DSL (Copper) Loop, Asymmetrical Digital Subscriber Line (ADSL) • TU-C 138 10 1104 kHZ • TU-R 25 to 138 kHZ 17.5 kft	LX- -	02QB9.005 (non-Shielded) or 02QB9.0S5 (Shielded)	02DU9.005
5	Line Sharing Capable HFPL, High Frequency Portion of the Loop (Voice and Data)	UA - S	02DU9.01A SBC Owned Splitter 2QB9.0S5 (non-Shielded) or 02QB9.0S5 (Shielded)	02DU9.01A
		UA--	CLEC Owned Splitter 4QB9.005 (non-Shielded) 4QB9.0S5 (Shielded)	
	DLE HFPSL, Digital Loop Electronics High Frequency Portion of the Sub-Loop (Voice and Data)	UA - -	02QD9.005	02DU9.01A
	DLE, Data only	LX- -	02QD9.005	02DU9.005

6	Available through Bona Fide Request (BFR) or Individual Case Basis (ICB) process. • 2-wire DSL (Copper) Loop Very High-band Symmetric Technology • Transmission systems use non-loaded loop facilities	LX- -	02QB9.006 (non-Shielded) or 02QB9.0S6 (Shielded)	02DU9.006
7	2-wire DSL (Copper) Loop • Short Reach Very High-band Symmetric Technology supports SDSL	LX- -	02QB9.007 (non-Shielded) or 02QB9.0S7 (Shielded)	02DU9.007

Note: DSL/PSD Loops (excluding PSD # 5b) must:

- Originate from the CLEC's Collocation arrangement to their End User's Premise
- Be served by a single Serving Wire Center, with the exception of PSD # 1a (IDSL) which can be configured on a multi-SWC.

Note: HFPL/Line Sharing is currently available with PSD # 5 (ADSL) only. If conditioning is recommended, the CLEC has the option to condition or not to condition the loop. If the CLEC chooses not to condition the loop for HFPL , Pacific Bell/Nevada Bell will provision the loop as a sub-standard/non-standard loop.

Important: Orders for HFPL/Line Sharing are processed if the CLEC's End User has an existing Pacific Bell/Nevada Bell retail service. Service Requests that do not qualify, are rejected back to the CLEC.

Refer to section 8.3 LSR Examples for the Pacific Bell/Nevada Bell Line Sharing Job Aids.

1.2 Technical Publications Related to Unbundled Loop

Technical standards for Unbundled Loop are documented in the **PB/NB Technical Publication PUB L-780063.**

Technical Publications related to Unbundled Loops can be ordered by contacting:

Pacific Bell/Nevada Bell
Technical Publication Information
2600 Camino Ramon, Room 1S050EE
San Ramon, CA 94583
925-823-6321

All Bellcore Technical Publications can be ordered by referring to Bellcore Information (http://telecom-info.bellcore.com)